1972
Annual Index

Each article appearing in TAXES during 1972 is indexed below according to title and author (or authors). In addition, most of the articles have been listed under an appropriate general subject heading and Code sections.

A

Accident or health plans...Oct., p. 595.

Accounting methods and practices
Inventory valuation problems. Dec., p. 748.
Merit in conformity of tax to financial accounting. Dec., p. 761.
New developments. March, p. 146.
Taxing role for most CPAs. Nov., p. 666.

Acquisitions
Analysis of certain statutory restrictions on the "A" and "C" reorganizations. Nov., p. 648.
Can net operating losses be carried over in corporate mergers and sellouts? Mar., p. 178.
Corporate acquisitions under the income tax. Feb., p. 85.

Acquisitions of Financially Troubled Businesses. Dec., p. 809.

Analysis of Certain Statutory Restrictions on the "A" and "C" Reorganizations, An. Nov., p. 648.

Annuity plans...Jan., p. 46.

Application of the Belgian Value Added Tax (TVA) to Foreign Sellers of Goods and Services. Aug., p. 492.

Aspects of Tax Policy. Dec., p. 722.

Avoiding the Gift Tax on Political Contributions: Obstacles and Opportunities. Nov., p. 671.

B

Bankruptcy proceedings...Dec., p. 809.

Basis rule for property transferred by gift or at death...Dec., p. 831.

Belgian-United States income tax treaty...Jan., p. 25.

Belgian value added tax...Aug., p. 492.

Berger, Theodore—Acquisitions of Financially Troubled Businesses. Dec., p. 809.

Block. Julian—New United States-Belgian Income Tax Treaty. Jan., p. 25.

Blum, Walter J.—Corporate Acquisitions Under the Income Tax: Another Approach. Feb., p. 85.

Bond purchase plans...Jan., p. 46.

Bromberg, Robert S. and Norman A. Sugarman —Termination of Private Foundations. July, p. 388.

Burke, Thomas D., H. Brian Holland, Gerald J. Holtz, James E. Markham, Jr., and Charles M. Pugh—Treasury Settlement Procedures. Oct., p. 601.

C

Can Net Operating Losses Be Carried Over in Corporate Mergers and Sellouts? Mar., p. 178.

Capital gains
Tax consequences of compensation arrangements. Dec., p. 797.
Taxation of patents—Does "field of use" reservation prevent capital gains treatment? Nov., p. 696.

Charitable contributions
Termination of private foundations. July, p. 388.

Child and dependent care deduction provisions...Mar., p. 133.

Child Care Facilities—Some Unanswered Questions. Aug., p. 453.

Clarke, Robert W. and J. Finley Lee—Employee Life Insurance Benefits: The Inequity of Section 79. Feb., p. 120.

Comments on Proposed and Final Regulations on Income Tax Treatment of Corporate Debt Issued at Discount. May, p. 274.

Commodity Futures: Critical Tax Consequence of Closing a Short Position. Apr., p. 207.

Comparability Under Sec. 401(a): Of Theoretical or Practical Value? Aug., p. 459.

Compensation plans
Reasonableness of executive's compensation in a closely held company. June, p. 347.
Tax consequences of compensation arrangements. Dec., p. 797.

Congressional tax trends...Nov., p. 683.

Corneel, Frederic G.—From the Thoughtful Tax Man. July, p. 440.

Corporate Acquisitions Under the Income Tax: Another Approach. Feb., p. 85.

Covey, Richard B.—Possible Changes in the Basis Rule for Property Transferred by Gift or at Death. Dec., p. 831.

Criminal tax investigations...June, p. 325.

Critical Analysis of Private Annuity Taxation. Jan., p. 11.

D

Dascher, Paul E. and Robert H. Strawser—A Taxing Role for Most CPAs. Nov., p. 666.

Death benefit plans...Oct., p. 580.

Deductibility of listing and registration fees...June, p. 353.

Deduction for Office-at-Home Expenses by Employees. June, p. 343.

Deduction of professional fees...Dec., p. 771.

Deductions for transportation, meals and lodging...Aug., p. 473.

Deferred compensation plans...Aug., p. 459.

Dependent care and household service expense deductions...Oct., p. 589.

Depreciation and the Farm-Loss Recapture Provisions of Section 1251. Nov., p. 660.

Developing Patterns in the Deduction of Professional Fees. Dec., p. 771.

DISC status
Electing DISC benefits. May, p. 304.
Operating a DISC. Dec., p. 783.

District Director's Institute on Federal Taxation
Small Tax Cases. Oct., p. 624.
Treasury Settlement Procedures. Oct., p 601.

Dixon, James E.—Liquidation of an Insolvent Subsidiary. Sept., p. 514.

Duncan, E. W.—Interest Equalization Tax and Eurodollar Borrowing—Revisited. Nov., p. 690.

E

Electing DISC Benefits. May, p. 304.

Employee benefits
Comparability under Sec. 401(a): Of theoretical or practical value? Aug., p. 459.
Deduction for office-at-home expenses by employees. June, p. 343.
Employee death benefit plans—a reappraisal. Oct., p. 580.
Employee—stockholders can benefit from medical reimbursement plans. Oct., p. 595.
Life insurance benefits: The inequality of Section 79. Feb., p. 120.
Meaning of forfeitability under the 1954 Code. Feb., p. 114.

Employee Death Benefit Plans—A Reappraisal. Oct., p. 580.

Employee Life Insurance Benefits: The Inequity of Section 79. Feb., p. 120.

Employee-Stockholders Can Benefit from Medical Reimbursement Plans. Oct., p. 595.

Equalizing Tax Equalization. Feb., p. 105.

Erbacher, Philip J.—Is Taxpayer's Refund Suit Necessarily Moot if U. S. Offers Full Refund? Mar., p. 166.

Establishing a Successful Retirement Program. Jan., p. 46.

Estate and gift tax
Avoiding the gift tax on political contributions: obstacles and opportunities. Nov., p. 671.
Critical analysis of private annuity taxation. Jan., p. 11.
Employee death benefit plans—a reappraisal. Oct., p. 580.
Federal tax implications of gifts net of gift tax. Sept., p. 525.
Possible changes in the basis rule for property transferred by gift or at death. Dec., p. 831.
Short-term trust: A worthwhile tax saving tool. Mar., p. 153.
Some cogitations about contingencies. July, p. 428.
Spreading the family income. Apr., p. 197.
Use of trusts in tax planning for the professional. July, p. 420.

Eurodollar borrowing and the Interest Equalization Tax...Nov., p. 690.

Executive compensation
Equalizing tax equalization. Feb., p. 105.
Reasonableness of executive's compensation in a closely held company. June, p. 347.
Tax consequences of compensation arrangements. Dec., p. 797.

F

Farm-loss recapture provisions of Section 1251...Nov., p. 660.

Federal Tax Implications of Gifts Net of Gift Tax. Sept., p. 525.

Feinschreiber, Robert
Child Care Facilities—Some Unanswered Questions. Aug., p. 453.
Electing DISC Benefits. May, p. 304.

Feinschreiber, Robert and Alan W. Granwell—Avoiding the Gift Tax on Political Contributions: Obstacles and Opportunities. Nov., p. 671.

Fink, Robert S.—Use and Abuse of the Grand Jury in the Criminal Tax Investigation. June, p. 325.

First Security Bank of Utah Taxpayer Disability and the Supreme Court. May, p. 260.

Foreign taxation
Application of the Belgian value added tax (TVA) to foreign sellers of goods and services...Aug., p. 492.
Electing DISC benefits. May, p. 304.
Equalizing tax equalization. Feb., p. 105.
Guide to U. S. Income taxation of West German investors. Sept., p. 544.
Interest Equalization Tax and Eurodollar borrowing. Nov., p. 690.
New United States-Belgian income tax treaty. Jan., p. 25.
"Per diem" in Italy—A moneysaver for employers and employees. June, p. 369.
Tax consequences of a corporate investment in Israel. June, p. 359.
Tax planning for the most effective use of Puerto Rico tax-exempt profits. May, p. 310.

Fraser, O'Hear W., Jr.—Taxing the Limited Partnership as a Corporation. June, p. 333.

From the Thoughtful Tax Man. Jan., p. 59; June, p. 372; July, p. 440.

G

Galant, Jeffrey A.—Section 337 and the *Rushing* Case. Apr., p. 216.

Gibbs, Lawrence B.—Developing Patterns in the Deduction of Professional Fees. Dec., p. 771.

Gifts net of gift tax...Sept., p. 525.

Goodman, Isidore—Establishing a Successful Retirement Program. Jan., p. 46.

Gould, Arthur I.—Trends in Tax Planning for Real Estate Investments. Dec., p. 732.

Grand jury in the criminal tax investigation... June, p. 325.

Granwell, Alan W. and Robert Feinschreiber—Avoiding the Gift Tax on Political Contributions: Obstacles and Opportunities. Nov., p. 671.

Guide to U. S. Income Taxation of West German Investors. Sept., p. 544.

H

Hanson, Richard A. and Emory S. Naylor, Jr.—Some Observations Concerning the Operation of a DISC. Dec., p. 783.

Harriss, C. Lowell—State-Local Taxation—An Overview. Apr., p. 232.

Hickman, Frederic W.—Aspects of Tax Policy. Dec., p. 722.

Hjorth, Roland L.—A Tax Subsidy for Child Care: Sec. 210 of the Revenue Act of 1971. Mar., p. 133.

Hocky, Joseph S.—Some Cogitations About Contingencies. July, p. 428.

Holland, H. Brian, Thomas D. Burke, Gerald J. Holtz, James E. Markham, Jr., and Charles M. Pugh—Treasury Settlement Procedures. Oct., p. 601.

Holtz, Gerald J., H. Brian Holland, Thomas D. Burke, James E. Markham, Jr., and Charles M. Pugh—Treasury Settlement Procedures. Oct., p. 601.

Household service and dependent care expense deductions...Oct., p. 589.

I

Insurance

Employee life insurance benefits: The inequity of Section 79. Feb., p. 120.

Interest Equalization Tax and Eurodollar Borrowing—Revisited. Nov., p. 690.

Internal Revenue Service

Aspects of tax policy. Dec., p. 722.

Is taxpayer's refund suit necessarily moot if U. S. offers full refund? Mar., p. 166.

Public hearings for private rulings: A dissent. Mar., p. 160.

Treasury Settlement Procedures. Oct., p. 601.

Use and abuse of the grand jury in the criminal tax investigation. June, p. 325.

International tax planning

Application of the Belgian value added tax (TVA) to foreign sellers of goods and services...Aug., p. 492.

Electing DISC benefits. May, p. 304.

Equalizing tax equalization. Feb., p. 105.

Guide to U. S. income taxation of West German investors. Sept., p. 544.

Interest Equalization Tax and Eurodollar borrowing. Nov., p. 690.

New United States-Belgian income tax treaty. Jan., p. 25.

"Per Diem" in Italy—A moneysaver for employers and employees. June, p. 369.

Some observations concerning the operation of a DISC. Dec., p. 783.

Tax consequences of a corporate investment in Israel. June, p. 359.

Inventory Valuation Problems. Dec., p. 748.

Is Taxpayer's Refund Suit Necessarily Moot if U. S. Offers Full Refund? Mar., p. 166.

Israeli Income Tax Ordinance...June, p. 359.

J

Javaras, George B., Jack S. Levin and Howard G. Krane—Public Hearings for Private Rulings: A Dissent. Mar., p. 160.

Johnson, Arnold C.—Minimum and Maximum Taxes After Two Years—A Survey and General Evaluation. Feb., p. 68.

Johnson, Gordon H.—Commodity Futures: Critical Tax Consequence of Closing a Short Position. Apr., p. 207.

K

Kaplan, Robert N. and Susan F. Klein—Tax Consequences of a Corporate Investment in Israel. June, p. 359.

Karachale, Anthony—Deduction for Office-at Home Expenses by Employees. June, p. 343.

Klein, Susan F. and Robert N. Kaplan—Tax Consequences of a Corporate Investment in Israel. June, p. 359.

Koff, Howard M.—Partnerships and the Special Allocation: The Winds of Change. Jan., p. 5.

Krane, Howard G., Jack S. Levin and George B. Javaras—Public Hearings for Private Rulings: A Dissent. Mar., p. 160.

Krug, Arthur J.—Listing and Registration Fees: Deductible or Not? June, p. 353.

Kuhn, Harold A.—The Strange Case of *Yenoom* Spelled Backwards. Aug., p. 497.

L

Lee, J. Finley and Robert W. Clarke—Employee Life Insurance Benefits: The Inequity of Section 79. Feb., p. 120.

Levin, Jack S., Howard G. Krane and George B. Javaras—Public Hearings for Private Rulings: A Dissent. Mar., p. 160.

Lewis, Stuart M.—Employee Death Benefit Plans—A Reappraisal. Oct., p. 580.

Lile, Stephen E., Seung Oh Part and Don M. Soule—Tax Exporting and the Fallacy of Taxes per Capita as a Measure of Personal Tax Burdens Among States. Apr., p. 224.

Liles, Kenneth H.—Operating and Terminating Private Foundations. Dec., p. 851.

Limited partnership

Taxing the limited partnership as a corporation. June, p. 333.

Trends in tax planning for real estate investments. Dec., p. 732.

Liquidation of an Insolvent Subsidiary. Sept., p. 514.

Listing and Registration Fees: Deductible or Not? June, p. 353.

Lowenstein, Joseph R.—Federal Tax Implications of Gifts Net of Gift Tax. Sept., p. 525.

M

Making Tax Deductions Really Work. Aug., p. 477.

Markham, James E., Jr., Gerald J. Holtz, H. Brian Holland, Thomas D. Burke, and Charles M. Pugh—Treasury Settlement Procedures. Oct., p. 601.

Martin, Spencer J.—Can Net Operating Losses Be Carried Over in Corporate Mergers and Sellouts? Mar., p. 178.

Matsunaga, Spark M.—Recent Tax Trends in Congress. Nov., p. 683.

McKinney, James E.—The Meaning of Forfeitability Under the 1954 Code. Feb., p. 114.

Meaning of Forfeitability Under the 1954 Code, The. Feb., p. 114.

Medical reimbursement plans...Oct., p. 595.

Mergers
Analysis of certain statutory restrictions on the "A" and "C" reorganizations. Nov., p. 648.
Can net operating losses be carried over in corporate mergers and sellouts? Mar., p. 178.
Corporate acquisitions under the income tax: another approach. Feb., p. 85.
Triangular mergers. Dec., p. 820.

Merit in Conformity of Tax to Financial Accounting, The. Dec., p. 761.

Metzer, Patricia Ann—Comparability Under Sec. 401(a): Of Theoretical or Practical Value? Aug., p. 459.

Minimum and Maximum Taxes After Two Years—A Survey and General Evaluation. Feb., p. 68.

Misplaced Bracket and a Spurious Question, A: Sec. 162(a)(2). Aug., p. 473.

Monyek, Robert H.—Tax Consequences of Compensation Arrangements. Dec., p. 797.

Mullock, Philip—A Misplaced Bracket and a Spurious Question: Sec. 162(a)(2). Aug., p. 473.

N

Naylor, Emory S., Jr. and Richard A. Hanson—Some Observations Concerning the Operation of a DISC. Dec., p. 783.

Net gift...Sept., p. 525.

New Developments in the Area of Accounting Methods and Correction of Errors. Mar., p. 146.

New Household Service Expense and Dependent Care Expense Deduction, The: Who Will Benefit? Oct., p. 589.

New Tax Breaks for Political Contributions. Aug., p. 468.

New United States-Belgian Income Tax Treaty. Jan., p. 25.

NYS Bar Association Tax Section, Committee on Corporate Taxation—Comments on Proposed and Final Regulations on Income Tax Treatment of Corporate Debt Issued at Discount. May, p. 274.

Nolan, John S.—The Merit in Conformity of Tax to Financial Accounting. Dec., p. 761.

O

O'Connor, Walter F. and Ralph J. Sierra, Jr.—Tax Planning for the Most Effective Use of Puerto Rico Tax-Exempt Profits. May, p. 310.

Operating and Terminating Private Foundations. Dec., p. 851.

Original issue discount (OID)...May, p. 274.

Osterweil, Eric—Application of the Belgian Value Added Tax (TVA) to Foreign Sellers of Goods and Services. Aug., p. 492.

P

Panel Discussion—Treasury Settlement Procedures. Oct., p. 601.

Part, Seung Oh, Stephen E. Lile and Don M. Soule—Tax Exporting and the Fallacy of Taxes per Capita as a Measure of Personal Tax Burdens Among States. Apr., p. 224.

Partnerships and the Special Allocation: The Winds of Change. Jan., p. 5.

Patents taxation...Nov., p. 696.

Pension plans
Comparability under Sec. 401(a): of theoretical or practical value? Aug., p. 459.
Establishing a successful retirement program. Jan., p. 46.

"Per Diem" in Italy—A Moneysaver for Employers and Employees. June, p. 369.

Phelan, Marilyn—An Analysis of Certain Statutory Restrictions on the "A" and "C" Reorganizations. Nov., p. 648.

Political contributions
Avoiding the gift tax. Nov., p. 671.
New tax breaks. Aug., p. 468.

Possible Changes in the Basis Rule for Property Transferred by Gift or at Death. Dec., p. 831.

Preferential tax income...Feb., p. 68.

Private annuity taxation...Jan., p. 11.

Private foundations
Operating and terminating private foundations. Dec., p. 851.
Termination of private foundations. July, p. 388.

Private rulings...Mar., p. 160.

Procedures and policies involved in settlement of tax cases...Oct., p. 601.
Professional fees...Dec., p. 771.

Profit-sharing plans
Comparability under Sec. 401(a): Of theoretical or practical value? Aug., p. 459.
Establishing a successful retirement program. Jan., p. 46.

Propp, Theodore—Spreading the Family Income. Apr., p. 197.

Public Hearings for Private Rulings: A Dissent. Mar., p. 160.

Puerto Rico tax-exempt profits...May, p. 310.

Pugh, Charles M., H. Brian Holland, Thomas D. Burke, Gerald J. Holtz, and James E. Markham, Jr.—Treasury Settlement Procedures. Oct., p. 601.

Q

Qualifications of liquidation of an insolvent subsidiary...Sept., p. 514.

R

Raiborn, Mitchell H. and Frank E. Watkins, Jr.—Critical Analysis of Private Annuity Taxation. Jan., p. 11.

Real estate investment
Tax planning for equity financing by real estate developers. Sept., p. 530.
Trends in tax planning. Dec., p. 732.

Reasonableness of Executive's Compensation in a Closely Held Company, The. June, p. 347.

Recent Tax Trends in Congress. Nov., p. 683.

Registration and listing fees of stock or securities...June, p. 353.

Reorganizations
Acquisitions of financially troubled businesses. Dec., p. 809.
Analysis of certain statutory restrictions on the "A" and "C" reorganizations. Nov., p. 648.

Reorganizations—cont'd
Triangular mergers. Dec., p. 820.

Rutherford, Thomas F.—From the Thoughtful Tax Man. Jan., p. 59.

S

Sale of a patent...Nov., p. 696.

Satinover, Terry and Howard B. Sweig—Guide to U. S. Income Taxation of West German Investors. Sept., p. 544.

Schneidman, Leonard—New Tax Breaks for Political Contributions. Aug., p. 468.

Sec. 210 of the Revenue Act of 1971...Mar., p. 133.

Section 337 and the *Rushing* Case. Apr., p. 216.

Section 72...Jan., p. 11.

Section 79...Feb., p. 120.

Section 105...Oct., p. 595.

Section 162...Aug., p. 473; Dec., p. 771.

Section 165(g)(3)...Sept., p. 514.

Section 212...Dec., p. 771.

Section 214...Oct., p. 589.

Section 269...Mar., p. 178.

Section 332...Sept., p. 514.

Section 337...Apr., p. 216.

Section 368(a)(2)(E)...Nov., p. 648.

Section 371...Dec., p. 809.

Section 381...Mar., p. 178; Dec., p. 809.

Section 382...Mar., p. 178.

Section 401(a)...Aug., p. 459.

Section 453...Apr., p. 216.

Section 482...May, p. 260.

Section 507...July, p. 388; Dec., p. 851.

Section 704(b)...Jan., p. 5.

Section 1232...May, p. 274.

Section 1233...Apr., p. 207.

Section 1245...Nov., p. 660.

Section 1251...Nov., p. 660.

Section 1348...Feb., p. 68.

Section 2033...July, p. 428; Oct., p. 580.

Section 2035...Oct., p. 580.

Section 2036...Oct., p. 580.

Section 2038...Oct., p. 580.

Section 2039...Oct., p. 580.

Section 2042...Oct., p. 580.

Section 4940...Dec., p. 851.

Section 4941...Dec., p. 851.

Section 4942...Dec., p. 851.

Section 7463...Oct., p. 624.

Self-employed office-at-home expenses...June, p. 343.

Shapiro, Daniel S.—Tax Planning for Equity Financing by Real Estate Developers. Sept., p. 530.

Shiens, Edmund—New Developments in the Area of Accounting Methods and Correction of Errors. Mar., p. 146.

Short sales of stock and commodities...Apr., p. 207.

Short-Term Trust, The: A Worthwhile Tax Saving Tool. Mar., p. 153.

Sierra, Ralph J., Jr. and Walter F. O'Connor—Tax Planning for the Most Effective Use of Puerto Rico Tax-Exempt Profits. May, p. 310.

Simmons, Frederick L.—The Use of Trusts in Tax Planning for the Professional. July, p. 420.

Skinner, Robert G.—Inventory Valuation Problems. Dec., p. 748.

Skolnick, Richard B.—Employee-Stockholders Can Benefit from Medical Reimbursement Plans. Oct., p. 595.

Small Tax Cases. Oct., p. 624.

Smith, Ephraim P.—The Reasonableness of Executive's Compensation in a Closely Held Company. June, p. 347.

Some Cogitations About Contingencies. July, p. 428.

Some Observations Concerning the Operation of a DISC. Dec., p. 783.

Soule, Don M., Seung Oh Part and Stephen E. Lile—Tax Exporting and the Fallacy of Taxes per Capita as a Measure of Personal Tax Burdens Among States. Apr., p. 224.

Spreading the Family Income. Apr., p. 197.

State-Local Taxation—An Overview. Apr., p. 232.

State taxation
State-local taxation. Apr., p. 232.
Tax exporting and the fallacy of taxes per capita as a measure of personal tax burdens among states. Apr., p. 224.

Sterrett, Samuel B.—Small Tax Cases. Oct., p. 624.

Stock bonus plans...Jan., p. 46.

Stock options...Dec., p. 797.

Stockholder-employees medical reimbursement plans...Oct., p. 595.

Strange Case of *Yenoom* Spelled Backwards, The. Aug., p. 497

Strange, William O.—Equalizing Tax Equalization. Feb., p. 105.

Strawser, Robert H. and Paul E. Dascher—A Taxing Role for Most CPAs. Nov., p. 666.

Streuling, G. Fred—The New Household Service Expense and Dependent Care Expense Deduction: Who Will Benefit? Oct., p. 589.

Stutsman, Carl A., Jr.—Triangular Mergers. Dec., p. 820.

Sugarman, Norman A. and Robert S. Bromberg—Termination of Private Foundations. July, p. 388.

Sweig, Howard B. and Terry Satinover—Guide to U. S. Income Taxation of West German Investors. Sept., p. 544.

T

Tax and financial accounting differences...Dec., p. 761.

Tax Consequences of a Corporate Investment in Israel. June, p. 359.

Tax Consequences of Compensation Arrangements. Dec., p. 797.

Tax Court procedures for handling small tax cases...Oct., p. 624.

Tax equalization...Feb., p. 105.

Tax Exporting and the Fallacy of Taxes per Capita as a Measure of Personal Tax Burdens Among States. Apr., p. 224.

Tax Planning for Equity Financing by Real Estate Developers. Sept., p. 530.

Tax Planning for the Most Effective Use of Puerto Rico Tax-Exempt Profits. May, p. 310.

Tax Subsidy for Child Care, A: Sec. 210 of the Revenue Act of 1971. Mar., p. 133.

Tax trends in Congress...Nov., p. 683.

Taxation of Patents—Does "Field of Use" Reservation Prevent Capital Gains Treatment? Nov., p. 696.

Taxing Role for Most CPAs, A. Nov., p. 666.

Taxing the Limited Partnership as a Corporation. June, p. 333.

Termination of Private Foundations. July, p. 388.

Teschner, Paul A.—*First Security Bank of Utah* Taxpayer Disability and the Supreme Court. May, p. 260.

Treasury Settlement Procedures. Oct., p. 601.

Treaties

Guide to U. S. income taxation of West German investors. Sept., p. 544.

New United States-Belgian income tax treaty. Jan., p. 25.

Trends in Tax Planning for Real Estate Investments. Dec., p. 732.

Triangular Mergers. Dec., p. 820.

Trusts

Establishing a successful retirement program. Jan., p. 46.

Short-term trust: A worthwhile tax saving tool. Mar., p. 153.

Use of trusts in tax planning for the professional. July, p. 420.

U

Use and Abuse of the Grand Jury in the Criminal Tax Investigation. June, p. 325.

Use of Trusts in Tax Planning for the Professional, The. July, p. 420.

V

Vaughan, D. Michael—Depreciation and the Farm-Loss Recapture Provisions of Section 1251. Nov., p. 660.

Venuti, Emil Joseph—"Per Diem" in Italy—A Moneysaver for Employers and Employees. June, p. 369.

Vignola, Leonard R.—From the Thoughtful Tax Man. June, p. 372.

Voting stock...Nov., p. 648.

W

Watkins, Jr., Frank E. and Mitchell H. Raiborn—Critical Analysis of Private Annuity Taxation. Jan., p. 11.

Weinstock, Harold—The Short-Term Trust: A Worthwhile Tax Saving Tool. Mar., p. 153.

West German investors' U. S. income taxation...Sept., p. 544.

Winkelman, Peter M.—Taxation of Patents—Does "Field of Use" Reservation Prevent Capital Gains Treatment? Nov., p. 696.

Woodrow, Raymond J.—Making Tax Deductions Really Work. Aug., p. 477.

STATEMENT OF OWNERSHIP, MANAGEMENT AND CIRCULATION (Act of August 12, 1970: Section 3685, Title 39, United States Code)

1. Title of publication: TAXES—The Tax Magazine. 2. Date of filing: October 1, 1972. 3. Frequency of issue: Monthly.

4. Location of known office of publication: 4025 W. Peterson Ave., Chicago, Cook, Illinois 60646.

5. Location of the headquarters or general business offices of the publishers: Chicago, Ill. 60646.

6. Names and addresses of publisher, editor, and managing editor: publisher: Commerce Clearing House, Inc., Chicago, Ill. 60646; editor: Allen E. Schechter, Chicago, Ill. 60646; managing editor: George H. Harris, Chicago, Ill. 60646.

7. Owner: Commerce Clearing House, Inc., Chicago, Illinois 60646. Names and addresses of stockholders owning or holding 1 percent or more of total amount of stock: Bull & Co., Winston-Salem, N. C.; Eddy & Co., New York, New York; Ince & Co., New York, New York; Meth & Co., Denver, Colorado; Pitt & Co., New York, New York; Reing & Co., New York, New York; C T Corporation System, New York, New York; The Corporation Trust Company (Delaware), Wilmington, Delaware; The Millbrook Tribute, Millbrook, New York; Justus L. Schlichting, Toms River, New Jersey; Bertha Palmer Thorne, Bar Harbor, Maine; George T. Whalen, as Trustee under the will of Oakleigh Thorne, Millbrook, New York.

8. Known bondholders, mortgagees, and other security holders owning or holding 1 percent or more of total amount of bonds, mortgages or other securities: None.

9. For optional completion by publishers mailing at the regular rates: 39 U. S. C. 3626 provides in pertinent part: "No person who would have been entitled to mail matter under former section 4359 of this title shall mail such matter at the rates provided under this subsection unless he files annually with the Postal Service a written request for permission to mail matter at such rates." In accordance with the provisions of this statute, I hereby request permission to mail the publication named in Item 1 at the reduced postage rates presently authorized by 39 U. S. C. 3626. (Signed) Allen E. Schechter, editor.

10. For completion by nonprofit organizations authorized to mail at special rates: Not applicable.

11. Extent and nature of circulation:

11A. Total number copies printed (Net Press Run): Average number copies each issue during preceding 12 months: 13,908. Actual number of copies of single issue published nearest to filing date: 12,600. 11B. Paid circulation: 1. Sales through dealers and carriers, street vendors and counter sales: Average number copies each issue during preceding 12 months: None. Actual number of copies of single issue published nearest to filing date: None. 2. Mail subscriptions: Average number copies each issue during preceding 12 months: 12,591. Actual number of copies of single issue published nearest to filing date: 11,412. 11C. Total paid circulation: Average number copies each issue during preceding 12 months: 12,591. Actual number of copies of single issue published nearest to filing date: 11,412. 11D. Free distribution by mail, carrier or other means: 1. Samples, complimentary, and other free copies: Average number copies each issue during preceding 12 months: 213. Actual number of copies of single issue published nearest to filing date: 214. 2. Copies distributed to news agents, but not sold: Average number copies each issue during preceding 12 months: None. Actual number of copies of single issue published nearest to filing date: None. 11E. Total distribution (Sum of C and D): Average number copies each issue during preceding 12 months: 12,804. Actual number of copies of single issue published nearest to filing date: 11,626. 11F. Office use, left-over, unaccounted, spoiled after printing: Average number copies each issue during preceding 12 months: 1,104. Actual number of copies of single issue published nearest to filing date: 974. 11G. Total (Sum of E and F—should equal net press run shown in A): Average number copies each issue during preceding 12 months: 13,908. Actual number of copies of single issue published nearest to filing date: 12,600. I certify that the statements made by me above are correct and complete. (Signed) Allen E. Schechter.